USEPA Comments on

Initial Site Review Work Plan
Draft
Dated: December 3, 2019

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General Comment

All elements required in the ISR Work Plan, as described in Section 88.a. of the 3013 Order, which will be used to prepare the ISR Report are discussed in Section 6.0 of the Draft ISR Work Plan.

Specific Comments

1 Section 5.0

The areas described in Section 5.0 do not match with the names of some of the areas depicted on Figure 1 – Site Plan. For example, are West Ponds (Section 5.0) the same as Stormwater West Ponds (Figure 1)?

2. Section 5.0

There are no descriptions of Solvent Extraction (Area 200) and Bleed Treatment (Area 300). These two areas are listed in Section 2.0 and shown on Figure 1 but are not described in Section 5

3. Figure 1 – Site Plan

Some areas in the Legend do not correspond to areas depicted on the Site Plan (aerial photograph). For example, in the Legend, WOX Washing is shown bounded by a turquoise color box, but on the Site Plan it is shown bounded by an orange box.

4. Figure 1 − Site Plan

Due south of the area labeled Storm Water West Ponds is a white-roofed building. On the south side of this building there appears to be a retaining wall and gray material piled against it. What is this area and what is the gray material?

5. Provide an aerial photograph showing the facility boundary.